

2-19-93
12.3.8 v.6**ASH GROVE CEMENT COMPANY**Overland Park, Kansas

FILE

TO: Hans Steuch
 FROM: Bob Vantuyl *Bob Vantuyl*
 SUBJECT: Used Greases
 DATE: February 19, 1993

Doug - please follow up!
See Note below. Hans
HANS - done MS
→ Doug

I am in receipt of MSDS's that Doug Hale provided to this office in late January. In reviewing the MSDS's, Chevron Open Gear Lubricant Grade 100 CB used at the Seattle plant contains 20% 1,1,1 - Trichloroethane. I can't think of any reason that the used product would not be hazardous waste. Please review your management practices of this material to ensure proper disposition. You might want to consider switching to a different type of lubricant. I have some information if you so desire.

The other MSDS's you sent do not appear to exhibit the characteristic or be otherwise classified if waste. However, you should evaluate the used product in making this determination.

Should you have any questions, please contact me.

RVV:dkw

cc: DMS

When I last enquired, I was told that the Seattle high gear lubricant will yield very little waste - not the usual 30 gallons every 2-3 months.

Hans
This material is consumed in use, with no accumulation according to Doug. He will check for non-listed substitute anyway.

USEPA SF



1261864

AGC2G000005